

1 ROBERT ZINK
Chief, Fraud Section
2 U.S. Department of Justice, Criminal Division

3 TRACEE PLOWELL
Assistant Chief, Fraud Section, Criminal Division
4 MICHELLE PASCUCCHI
Trial Attorney, Fraud Section, Criminal Division
5 U.S. Department of Justice
1400 New York Ave., N.W., 3rd floor
6 Washington, D.C. 20530
Telephone (202) 616-1668
7 Email: Tracee.Plowell@usdoj.gov
Email: Michelle.Pascucci@usdoj.gov

8 Attorneys for Plaintiff
9

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF ARIZONA

12 United States of America

13 vs.
14

15 James B. Panther, Jr.,
16 a/k/a “James Suqui” and “James
17 Suquilanda,” and

18 Defendant.
19

Case No. CR-19-00448-PHX-DLR-2

**JOINT MOTION FOR SCHEDULING
ORDER**

20 The United States of America, by and through undersigned counsel, with the
21 consent of Defendants, and in accordance with the Court’s Order dated October 22, 2019,
22 hereby submits this Joint Motion for Scheduling Order and accompanying proposed order
23 for the Court’s consideration. The parties believe that the proposed dates identified below
24 are reasonable, will provide sufficient time to prepare for trial, and will not needlessly delay
25 the proceedings. Accordingly, the parties respectfully ask the Court to enter an order
26 imposing the filing deadlines identified herein.

27
28 **JOINT PROPOSED SCHEDULING ORDER**

A. Close of Government's Discovery:

1. Government's compliance with Rule 16 discovery: November 15, 2019
2. Government's expert disclosures, if any: January 22, 2020
3. Government's Rule 404(b) notification, if any: February 3, 2020
4. Government's production of *Jencks* material: February 28, 2020
5. Government's rebuttal expert disclosure, if any: February 28, 2020

B. Close of Defendant's Discovery:

1. Close of reciprocal Rule 16 discovery: January 15, 2020
2. Rebuttal and/or initial expert disclosures: February 3, 2020
3. Production of Rule 26.2 material, if any: March 6, 2020

C. Motions Deadlines:

1. Pretrial substantive motions: January 6, 2020
2. Responses to substantive motions: January 20, 2020
3. Replies, if any: January 27, 2020
4. Hearing on substantive motions: TBD

D. Other submissions:

1. Proposed jury questionnaires, if any: March 2, 2020
2. Proposed voir dire questions: March 2, 2020
3. Submission of joint statement of case: March 2, 2020
4. Joint proposed jury instructions: March 2, 2020
5. Joint proposed verdict form: March 2, 2020
6. Motions in limine: February 24, 2020
7. Responses to motions in limine: March 2, 2020
8. Hearing on motions in limine: TBD
9. Disclosure of summary charts: March 6, 2020
10. Disclosure of final exhibit and witness lists: March 6, 2020
11. Final pretrial conference: March 9, 2020

1 E. Jury trial (estimate 3-4 weeks):

March 16, 2020

2
3
4 Respectfully submitted,

5
6 ROBERT ZINK
7 Chief, Fraud Section
8 Criminal Division
9 U.S. Department of Justice

10 By: s/ Tracee J. Plowell
11 Tracee J. Plowell, Assistant Chief
12 Michelle Pascucci, Trial Attorney
13
14

15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on this 4th day of November, 2019, I electronically
17 transmitted the attached document to the Clerk's Office using the CM/ECF System for
18 filing and transmittal of a Notice of Electronic Filing to the following CM/ECF
19 registrants:

20
21 Dennis Kieran Burke, and Mark Samuel Kokanovich
22 Attorneys for Defendants

23
24 s/ Tracee J. Plowell
25 Attorney for the United States
26
27
28